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September 11, 2012

Mr. Jeff S. Jordan, Supervisory Attorney
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RECEIVED
2012 SEP 12 AM 10:35
OFFICE OF GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

RE: Nevada Republican State Central Committee (NRSCC)
FEC Committee ID #C00082925
MUR #6630 – Complaint against Washoe County Republican Party (WCRP)

Dear Mr. Jordan:

This office represents the Nevada Republican Party. We are in receipt of the aforementioned Matter Under Review dated August 23, 2012, received by our client on August 29, 2012.

Washoe County Republican Party filed papers claiming not to be affiliated with the NRSCC. All counties in Nevada are considered to be affiliated with NRSCC both by the State of Nevada and by the Federal Election Commission. The NRSCC has never encouraged any of its affiliated counties to file with the FEC nor has it encouraged any county to claim to be unaffiliated with the NRSCC. The NRSCC was unaware that Washoe County Republican Party filed papers with the FEC until after the fact. Our client has since been informed about the WCRP's Form 1, as well as an additional letter stating that there was no affiliation with the NRSCC. When the NRSCC learned about this situation, the NRSCC's Chairman contacted the FEC, and questioned the affiliation guidelines with respect to this issue. At that time, the response from the Information Division was that the FEC considers NRSCC and WCRP to be "one and the same entity."

At this time our client maintains, based upon the applicable regulations, as well as our client's with the Federal Election Commission, that WCRP would be considered affiliated with the NRSCC. The WCRP Chairman continues to serve as a voting member of the Executive Board of the NRSCC, participates in NRSCC decisions, and the WCRP continues to elect members to attend all meetings of the NRSCC. We believe in accordance with 11 C.F.R. § 1103(b) 3, which presumes state and local committees of a political party are affiliated, that an affiliation between the NRSCC and the WCRP does exist. Additionally, the bylaws (as referenced in the complaint) set forth and accepted by both entities provides for mutual authoritative powers with respect to financial decisions. All of this appears to demonstrate compliance with 11 C.F.R. § 1103.

Upon review of the WCRP monthly FEC reports and comparing them to NRSCC records, it does not appear that our client is in violation of any FEC Contribution Limits. We respectfully claim that NRSCC

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has not violated any portion of the Federal Election Campaign Act of 1971, as amended ("the Act") and no action should be taken against the NRSCC in this matter.

Sincerely,



James W. Pengilly, Esq.

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FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

FEDERAL ELECTION COMMISSION

2012 SEP 12 AM 10:36

OFFICE OF LEGAL COUNSEL

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 6630

NAME OF COUNSEL: James W. Pengilly, Esq.

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/11/12
Date

[Signature]
Respondent/Agent - Signature

C. H. [Signature]
Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Nevada Republican Party

MAILING ADDRESS: P.O. Box 40120
(Please Print)

Las Vegas, Nevada 89140

TELEPHONE- HOME

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Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

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